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Application No. 10/527,576

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**REMARKS**

Claims 1, 3, 5-8, and 10-14 remain pending in this application, with claims 1, 3, 6, 8 and 10 being amended by this response. Claim 6 have been amended to correct typographical errors. Claims 1 and 8 have been amended to clarify that a group having a plurality of devices is assigned to the data network using the topology editor. Support for this amendment can be found throughout the specification and more specifically in Figure 7, Figure 3, element 305 and from page 8, line 33 to page 9, line 17. Thus, it is respectfully submitted that no new matter has been added.

Claims 2, 4, and 9 have been cancelled in this response.

**Objections to the Claims**

The objection to Claim 4 is now moot as the claim is now cancelled.

**Rejection of Claims 6-8 and 10-14 under 35 U.S.C. § 112, second paragraph**

Claims 6-8 and 10-14 are rejected under 35 U.S.C. § 112, second paragraph, as being indefinite. Claims 6 and 8 have been amended accordingly to provide antecedent basis for all terms. Thus, in view of the amendments to the claims, it is respectfully submitted that this rejection is satisfied and should be withdrawn.

**Rejection of Claims 1, 5-8 and 11-13 under 35 U.S.C. 103(a).**

Claims 1, 5-8, and 11-13 are rejected under 35 U.S.C. 103(a) as being unpatentable over Angal (U.S. Patent No. 6,298,378) in view of Goodrich (U.S. Patent No. 6,516,326).

The present claimed invention provides a method for using a topology editor to prescribe a device notified in response to an event related to the operation of a data network. The method includes defining the event pertaining to the operation of a data network. The operation concerns the status of the data network or a device of the data network. A group consisting of a plurality of devices of the data network is then assigned to the event by use of the topology editor. A rule is then assigned to the event, wherein

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the rule defines at least one condition for triggering a notification of the event to the assigned device. The condition is to be activated when matched to a notification of the operation of the data network. Claims 1 and 8 contain features similar to those discussed above.

“The configuration of a firewall or other filtering/monitoring program typically requires a system administrator to manually configure a variety of rules for each device of a network. Therefore, a large amount of time is devoted to this manual configuration operation, whereby it becomes difficult for a system administrator to modify the operation of a system, without devoting a large amount of time to implement such change” (Page 1, lines 30-35). Thus, the present claimed invention provides a method for assigning a rule to a group consisting of a plurality of devices using a topology editor. In this way, a system administrator can minimize the time needed to assign rules to devices.

Angal et al. describe a technique for reporting events raised by entities on a computer network to an appropriate listener (Abstract). The filters can either have a one-to-one correspondence between filters and subscribers, with each filter having a single listener/subscriber (Figure 4), or the filter can have a several-to-one ratio, with each filter having several listeners/subscribers (Figure 7).

The Office Action asserts that Angal et al. disclose the principles of the present claimed invention. The Applicant respectfully disagrees. Specifically, Angal et al. describe event sinks that contain filters and forwards messages to listeners. The sink determines each individual listener that has subscribed to a filter and then forwards messages accordingly. Essentially, Angal et al. *individually assign each listener* to an event. This is wholly unlike the present claimed invention, which *assigns a group of devices* to an event. Thus, Angal et al. are fundamentally different than the present claimed invention, as Angal et al. are concerned with *individually assigning listeners to an event* and the present claimed invention is concerned with *assigning groups of devices to an event*. Therefore, it is respectfully submitted that Angal et al. neither disclose nor

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suggest “assigning a group consisting of a plurality of devices of said data network to said event by use of said topology editor” as recited in claim 1 of the present invention.

Goodrich describes a system and “method of automating the integration of different Energy Management Systems (EMS) electrical power grid databases into a single power grid database” (Abstract). The system includes a topology interface in which a “user is guided to each disconnect device...and uses a simple drag and drop to include the devices and terminals” (Col. 16, lines 35-37).

The Office Action asserts that Goodrich discloses the topology editor of the present claimed invention. The Applicant respectfully disagrees. Specifically, as described above, Goodrich merely describes *associating individual items* through a simple drag and drop procedure. This is wholly unlike the present claimed invention, which *associates a group* of devices to a filter. Thus, Goodrich is fundamentally different than the present claimed invention, as Goodrich is concerned with *associating individual items* and the present claimed invention is concerned with *assigning a group* of devices to a single event. Therefore, it is respectfully submitted that Goodrich, similar to Angal et al., neither discloses nor suggests “assigning a group consisting of a plurality of devices of said data network to said event by use of said topology editor” as recited in claim 1 of the present invention.

The Office Action asserts further that it would have been obvious to combine the systems of Angal et al. and Goodrich. The Applicant respectfully disagrees. Angal et al. and Goodrich are concerned with two totally different and unrelated objectives, Angal et al. are concerned with a system for filtering messages to devices and Goodrich is concerned with merely “add[ing] or delet[ing] specific equipment to resolve the disconnected devices” (Col. 16, lines 46-47). In addition, the Applicant respectfully submits that the approaches of Angal et al. and Goodrich are incompatible, as Angal et al. direct and transmit messages to devices when there are problems and Goodrich merely adds or deletes a device when there is a problem. Thus, the Applicant respectfully

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submits that there is no reason or motivation to combine the systems of Angal et al. and Goodrich.

The Office Action asserts even further that the combination of the systems of Angal et al. and Goodrich discloses the principles of the present claimed invention. The Applicant respectfully disagrees. Even if one were to combine the systems of Angal et al. and Goodrich, the combined system, similar to the individual systems, does not disclose the principles of the present claimed invention. Specifically, the combined system allows a user to *individually assign devices* to a filter using a topology editor having a graphical interface. This is wholly unlike the present claimed invention, which *assigns a group of devices* to an event as in the present claimed invention. Thus, the combined system is fundamentally different than the present claimed invention, as the combined system *individually assigns* devices to event and the present claimed invention *assigns a group of devices* to an event. Therefore, it is respectfully submitted that the combination, similar to the individual systems of Angal et al. and Goodrich, neither discloses nor suggests “assigning a group consisting of a plurality of devices of said data network to said event by use of said topology editor” as recited in claim 1 of the present invention.

As independent claim 8 contains features similar to independent claim 1, it is respectfully submitted that independent claim 8 is allowable for the same reasons as discussed above in regards to independent claim 1. In addition, as claims 5-7 and 11-13 are dependent on independent claim 1 and 8, it is respectfully submitted that they are allowable for the same reasons as discussed above in regards to independent claims 1 and 8. In view of the above remarks it is respectfully submitted that there is no 35 USC 112 compliant enabling disclosure in Angal et al. and Goodrich, when taken alone or in combination, that makes the present claim invention unpatentable. Thus, it is further respectfully submitted that this rejection is satisfied and should be withdrawn.

**Rejection of Claims 3, 10 and 14 under 35 U.S.C. 103(a).**

Claims 3, 10, and 14 are rejected under 35 U.S.C. 103(a) as being unpatentable over Angal in view of Goodrich and in further view of Vining (U.S. Patent # 7,152,075).

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Applicants disagree with the Examiners conclusions because for the reasons recited above, Applicants assert that Claims 3 and 10, and 14 are allowable as such claims depend on allowable Claims 1 and 8, respectively.

Having fully addressed the Examiner's rejections, it is believed that, in view of the preceding amendments and remarks, this application stands in condition for allowance. Accordingly then, reconsideration and allowance are respectfully solicited. If, however, the Examiner is of the opinion that such action cannot be taken, the Examiner is invited to contact the applicant's attorney at the phone number below, so that a mutually convenient date and time for a telephonic interview may be scheduled.

No fee is believed due. However, if a fee is due, please charge the additional fee to Deposit Account 07-0832.

Respectfully submitted,  
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